



RANCHO

LPG Holdings LLC

Ron Conrow
Western District Manager

Direct: (661) 368-7917

December 18, 2013

Mr. Jared Blumenfeld
Regional Administrator
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: ***Rancho LPG Holdings, LLC***

Dear Mr. Blumenfeld:

Attached for your review are two widely distributed e-mails from Janet Gunter of the San Pedro Peninsula Homeowners United (SPPHU). You were a recipient of one of these e-mails. In her e-mails, Ms. Gunter incorrectly states that "an EPA worst case calculation" of the consequence radius at the Rancho LPG storage facility in San Pedro "is over three miles."

Rancho LPG uses the methodologies required by EPA to develop our Risk Management Plan (RMP). The consequence radius calculated and described in our RMP is 0.5 miles. This consequence radius was calculated in conformance with the regulations set forth at 40 C.F.R. part 68. Our RMP is publicly available at the local CUPA office.

Rancho has discussed the consequence radius with staff at EPA Region 9, and EPA has also calculated the radius to be 0.5 miles and not the 3-plus miles asserted by Ms. Gunter. In short, the misinformation contained in the e-mails was not derived in accordance with EPA's methodology as described in the applicable regulations.

Rancho is committed to operating safely and in conformance with all regulatory requirements. We wanted to alert you to the inaccuracy in the attached emails and to assure you that the information contained in our RMP regarding the consequence radius is accurate. Please contact me if you believe the consequence radius contained in our RMP is inaccurate.

Also feel free to contact me regarding any other aspect of Rancho's operations.

Sincerely,

Ron Conrow

cc: Ms. Mary Wesling

10/14/13
✓
Kit Fox

From: Janet Gunter <arriane5@aol.com>
Sent: Monday, October 14, 2013 1:59 PM
To: wesling.mary@epamail.epa.gov; dan.tilema@csb.gov; helmlinger.andrew@epa.gov; don.holmstrom@csb.gov; Beth.Rosenberg@csb.gov; Rafael.Moure-Eraso@csb.gov; Mark.Griffon@csb.gov; lisa.pinto@mail.house.gov; elise.swanson@mail.house.gov; Kit Fox; chateau4us@att.net; sally.magnani@doj.ca.gov; rob.wilcox@lacity.org; maurice_lyles@boxer.senate.gov; michael_davies@feinstein.senate.gov; blumenfeld.jared@epa.gov
Subject: Fwd: Response from Prof. Heaton at Cal Tech re: LA Times article Seismic building collapse&RanchoLPG

For your immediate attention! Do you think the Professor's concern should be any less now that the tanks and infrastructure are over 40 years old?

-----Original Message-----

From: Heaton, Thomas H. <heaton@caltech.edu>
To: Janet Gunter <arriane5@aol.com>
Sent: Mon, Oct 14, 2013 11:11 am
Subject: RE: Massive Explosive Butane Tanks sitting in actual Rupture Zone of Palos Verdes Fault

Janet,

Earlier in my career I did some work about the hazards from liquefied gas tanks in San Pedro. If my memory serves me correct, these tanks were owned by Petrolane; perhaps, they are the same tanks you mentioned. I don't remember the details of my analysis, but I came away with the impression that failure of these tanks would indeed be truly catastrophic. My recollection was that I was concerned about potential sloshing of the liquefied gas. There was a double-wall Dewar configuration to the tank. If the fluid sloshed over the top of the inner tank it would contact the outer tank wall which could cause fracture because of the extremely low temperatures. Of course, that was more than 30 years ago and I have not had occasion to revisit this problem.

Tom Heaton

Thomas Heaton
Prof. of Engineering Seismology
Director of the Earthquake Engineering Research Laboratory
California Institute of Technology
626 395 4232
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<http://heaton.caltech.edu/>

From: Janet Gunter [<mailto:arriane5@aol.com>]
Sent: Monday, October 14, 2013 10:05
To: Heaton, Thomas H.
Subject: Massive Explosive Butane Tanks sitting in actual Rupture Zone of Palos Verdes Fault

Hello Professor--

Thank you so much for your recent study of the concrete buildings and the warning of their seismic risk. My name is Janet Gunter, and I am with a homeowners group in San Pedro that has been fighting for decades to remove an ultra hazardous facility that poses an enormous threat in multiple ways. Please see the attached LA Times articles that reflect grave concern from almost 40 years ago. On every level this threat has gotten only worse with time. It is a miracle that we have escaped catastrophe. I do not suspect that our luck will last forever. The two 12.5 MILLION GALLON butane gas tanks were built in 1972-73 to a seismic sub-standard of 5.5-6.0 on a Fault with a magnitude of 7.3. This facility (now owned by Rancho LPG) circumvented proper permitting process due to the fact that it was being promoted by Richard Nixon for his close friend and supporter, RJ Munzer (owner). This thing NEVER should have been built in that

documented "Earthquake Rupture Zone". My point is that while the concrete building collapse is certainly a concern of major significance.....the absence of consideration of the chemical and fuel resources located in such geologically sensitive areas such as this one...make our earthquake safety analysis incredibly deficient. An EPA worst case calculation of blast radius from a single 12.5 Million Gallon butane tank is over 3 miles. Butane gas burns so hot that it will ignite combustibles for miles and this site is surrounded by fuel storage. The cascading failure event caused from an event here would dwarf the loss of lives from collapsed buildings. Our voices on this are simply not being heard. The political aim is to avoid having to confront the powerful energy industry...but, at what cost? Please try to elevate this concern if you recognize it. It is only through professionals like yourself that we will be able to reduce these serious risks. Professor Bob Bea from UC Berkeley has reviewed some of the details of this facility and has acknowledged his concern in an article in the Men's Journal from last Feb. (see final paragraph) <http://www.mensjournal.com/magazine/bob-bea-the-master-of-disaster-20130225>
It appears that even his voice on the issue has not made the impact that we had hoped. It is more than obvious that we need help. Meanwhile we are teetering on the precipice of this looming disaster that no one seems to want to prevent. It is just insane.

Thank you for reading and best of luck to you.

Best,

Janet G

From: Janet Gunter <arriane5@aol.com>
Sent: Sunday, November 03, 2013 12:29 AM
To: CPC@lacity.org; councildistrict15@lacity.org; Henry.Chu@lacity.org
Cc: lisa.pinto@mail.house.gov; elise.swanson@mail.house.gov;
maurice.lyles@boxer.senate.gov; michael_davies@feinstein.senate.gov;
richard.vladovic@lausd.net; rob.wilcox@lacity.org; MrErwinLaw@sbcglobal.net;
noelweiss@ca.rr.com; sally.magnani@doj.ca.gov
Subject: PONTE VISTA HOUSING PROJECT....NO MORE HOUSING UNTIL EXPLOSIVE FACILITY REMOVED!
Attachments: la_times_apr4_1977.pdf; la_times_jul16_1977.pdf; Amerigas_La_city_council_action_05.doc; AmerigasMotionbyJaniceHahn.doc; rancho_rail_accident_photo.jpg; waxman_press_release_aug_1_2013.doc; 07.31.13_LIEU_to_SFIM_Hoover_(1).pdf; 7_10_13_Rancho_EPA_Letter.pdf

TO WHOM IT MAY CONCERN....AND HOPEFULLY THERE IS "SOMEONE" THAT IT DOES CONCERN!

Any notion that it is "okay" to bring even 1 single additional resident into the North end of San Pedro while the extremely hazardous Rancho LPG facility is still operating.. is highly reckless and simply irresponsible!

Attached are two past Motions that were introduced by LA City Council members that clearly illustrate and confirm the complete understanding by LA City that this facility (operating at the time under the name of "Amerigas") is not only "inappropriate" in place, but, obviously "unsafe" to the existing residents of the San Pedro community. The proposed housing project at Ponte Vista, is aimed at introducing an additional several hundred homes and thousands of additional residents, at a site that is less than 1/4 mile (as the crow flies) from the grounds of the Rancho LPG facility. City Officials and agencies with jurisdiction over this development should be reprimanded for even considering this project in lieu of the dangers that are ever present from the high risk exposure posed by this massive 25 MILLION GALLON LIQUID PETROLEUM GAS facility! **NO FURTHER RESIDENTIAL HOUSING PROJECTS IN THIS LOCATION SHOULD BE INTRODUCED AT ALL WHILE THIS FACILITY IS STILL FUNCTIONING! IT IS INCONCEIVABLE THAT MORE POTENTIAL INNOCENT VICTIMS WOULD BE ENCOURAGED TO MOVE INTO THIS BLAST ZONE!**

The recent explosions in Florida from the "Blue Rhino LPG" facility caused a 1 mile evacuation of their sparse population. Because LPG fires cannot be extinguished with water or retardants, the fire caused them to wait 2 1/2 days for it to "burn itself out." The volume of gas involved in that disaster was approximately 1% of the volume of liquid energy gas stored at Rancho LPG.

Enclosed also are two archived articles from the LA Times in 1977 that exposed the City of LA's willingness during the early 1970's to exempt the LPG facility (operating under the name of Petrolane LPG at that time) from LA City Fire Regulations, CEQA, a proper public process, and allowed to use a fragmented permitting process. We have recently discovered that all of this was due to the influence of the Nixon White House whose close friend and campaign supporter, RJ Munzer, was owner of Petrolane LPG at that time.

The two largest Butane tanks at Rancho LPG sit in a LA Planning Department documented "Earthquake Rupture Zone", on land designated by USGS as "Landslide" and "Liquefaction" areas. The active Palos Verdes Fault (per Dr. Kate Hutton @ Cal Tech) that the tanks are sitting on has a magnitude of 7.3 while the tanks holding the ultra-hazardous gas were built without LA City Building Permits to seismic sub-standard of 5.5-6.0! Using an EPA calculation for worst case scenario....the two tanks alone (there are 5 other smaller LPG tanks) have a blast radius of over 6 miles! That radius does NOT take into consideration the "cascading failure event" potential that is guaranteed since these tanks sit directly next to a major oil refinery, across the street from the Naval Fuel Depot (housing massive amounts of jet propellants), above a hornet's nest of chemical and fuel pipelines, and within 1/2 mile of several marine oil terminals at the Port of LA. Attached is a photo of a Rancho LPG railcar accident from a year ago that miraculously escaped devastating results. But, how much longer will that luck last?

As witnessed by the recent LAX deadly attack this past Friday, "Terrorism" and acts of violence are facing a significant rise. The tantalizing opportunity for terrorism at this facility is extraordinary. The tanks of this facility could be easily penetrated by any rifle or rocket launched grenade and produce overwhelming death and destruction. The Ports of LA and Long Beach rank high on the list of terrorism targets. Both of these ports could be easily decimated by an attack on the LPG tanks. Enclosed also in this email are recent letters from Congressman Waxman to Homeland Security regarding this facility, as well as letters from Congresswoman Hahn and Senator Lieu to other officials with

jurisdiction. Clearly, the jeopardy is extremely high and the *nerve* to contemplate additional population to this area at this time is *unfathomable*. No one should even be discussing it!

Until, and unless this major threat is removed there should be no further movement toward the creation of any additional housing. Rational minds must take hold to **protect public safety!**

Our City Councilman, Joe Buscaino, ran on the campaign slogan "PUBLIC SAFETY FIRST"! That is what people want! We call upon Councilman Buscaino to honor that pledge!! **PEOPLE OVER PROFITS....** regardless of whether that is the oil industry or real estate developers! The Councilman's commitment is to his constituency, not to his campaign coffers. It is outrageous to realize that this project has been allowed to move this far. **STOP...AND ACT TO PROTECT PEOPLE NOW...BEFORE IT IS TOO LATE!!**

Janet Gunter

(310) 251-7075

CITIZENS for RESPONSIBLE and EQUAL ENVIRONMENTAL PROTECTION